

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
STATEMENT OF FINDINGS**

The Department of Toxic Substances Control (DTSC) has issued Findings for this project pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21081) and implementing Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15091 et seq.)

A. PROJECT SUBJECT TO DTSC APPROVAL

PROJECT TITLE: Former Naval Information Research Foundation Under Sea Center Removal Action Workplan		CALSTARS CODING:
PROJECT ADDRESS: 3200 East Foothill Boulevard	CITY: Pasadena	COUNTY: Los Angeles
PROJECT SPONSOR: Trammell Crow Company	CONTACT: Neal Holdridge	PHONE/ EMAIL: (949) 477-4719 nholdridge@trammellcrow.com

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:

- | | | | |
|---|---|--|---------------------------------------|
| <input type="checkbox"/> Initial Permit Issuance | <input type="checkbox"/> Permit Renewal | <input type="checkbox"/> Permit Modification | <input type="checkbox"/> Closure Plan |
| <input checked="" type="checkbox"/> Removal Action Workplan | <input type="checkbox"/> Remedial Action Plan | <input type="checkbox"/> Interim Removal | <input type="checkbox"/> Regulations |
| <input type="checkbox"/> Other (specify): | | | |

STATUTORY AUTHORITY:

- | | | |
|---|--|---|
| <input type="checkbox"/> California H&SC, Chap. 6.5 | <input checked="" type="checkbox"/> California H&SC, Chap. 6.8 | <input type="checkbox"/> Other (specify): |
|---|--|---|

PROJECT DESCRIPTION (List Specific Activities Proposed To Be Undertaken):

The project consists of the Department of Toxic Substances Control's (DTSC) approval of the Removal Action Workplan (RAW) for the former Naval Information Research Foundation Under Sea Center (NIRF) Site prior to the construction of a mixed-use development. The Site occupies approximately 9.15 acres located at 3200 East Foothill Boulevard, Pasadena, Los Angeles County. The 3200 E. Foothill Project includes two properties, one located on the south side of East Foothill Boulevard, between North Kinneloa Avenue and Sierra Madre Villa Avenue in East Pasadena and one located on the south side of East Foothill Boulevard between North Kinneloa Avenue and the I-210 freeway ("project site" or "site"). However, development would only occur on the site east of North Kinneloa Avenue. The site west of North Kinneloa Avenue is envisioned for non-programmed passive recreational use.

The City of Pasadena prepared a Draft Sustainable Communities Environmental Assessment (SCEA) and held a 30-day public comment period between February 8, 2018 to March 9, 2018. DTSC submitted comments on the Draft SCEA on September 21, 2018. The Draft SCEA includes mitigation measures addressing several areas including biological, cultural, hazards and hazardous materials, noise, traffic and utilities. Since the RAW effort will be included as part of the project, DTSC, as the California Environmental Quality Act (CEQA) Responsible Agency, is utilizing the SCEA for the CEQA analysis of the RAW.

DTSC sent comments on the draft RAW, dated June 16, 2017, and a revised RAW addressing those comments was received on December 11, 2017. The RAW addresses the environmental conditions identified at the site from past activities. The RAW focuses on excavation of impacted soil that exceeds the site-specific cleanup levels to minimize future human exposure to the identified chemicals of concern (COCs) including: metals (lead, mercury, hexavalent chromium and arsenic), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPH), trichloroethylene (TCE) and tetrachloroethylene (PCE). Excavation and soil removal will be performed from four distinct areas (Areas of Concern 1-4) on the property. Area of Concern-1 (AOC-1) Storm Drain System consists of 1,000-1,200 linear feet of clay pipe, numerous storm drain inlet, and catch basins and seven seepage pits. AOC-2 includes five known and two suspected storm water seepage pits. AOC-3 includes four hotspots impacted with PCE and metals. AOC-4 is impacted with low levels of volatile organic compounds detected in oil gas detected throughout the site. Based on analysis conducted using the National Contingency Plan criteria, a combination of soil excavation, off-site disposal, soil gas survey and vapor intrusion mitigation (if necessary) is the preferred alternative for the removal action at the site. An estimate of 1731 tons of soil (or 1155 cubic yards) and impacted material will be excavated from the site and disposed of at an approved-facility. Soil-gas survey will be conducted at the conclusion of the excavation and backfill. Additional vapor intrusion mitigation, if needed, will be

implemented during the construction phase of the development. The expected duration of the removal action is approximately 140 days.

B. LEAD AGENCY ENVIRONMENTAL DOCUMENT REVIEWED

Lead Agency: City of Pasadena

Lead Agency Environmental Document: Sustainable Communities Environmental Assessment (February 8, 2018)
City of Pasadena

Date Certified: City of Pasadena (July 23, 2018),

State Clearinghouse Number: 2018021017

C. STATEMENT OF FINDINGS AND FACTS FOR ADEQUACY OF LEAD AGENCY ENVIRONMENTAL DOCUMENT

Using its independent judgment, DTSC makes the following findings:

☒ The Lead Agency Final Environmental Document includes a description of the Project now before DTSC for decision

☒ The Lead Agency Final Environmental Document adequately analyzed impacts associated with the Project before DTSC for decision.

☒ DTSC concurs with the findings made by the Lead Agency Final Environmental Document relating to the Project before DTSC for decision.

☒ Mitigation measures are included in the Lead Agency Final Environmental Document for the following resources that would potentially be affected by the DTSC project.

[The City's SCEA incorporated applicable mitigation measures from the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Program Environmental Impact Report Mitigation Monitoring and Reporting Program, the City of Pasadena General Plan Environmental Impact Report (EIR), and the East Pasadena Specific Plan EIR. The mitigation measures were not imposed by the City if the project was found to be in substantial compliance with the mitigation measure as proposed or if the mitigation measures were found not to be relevant. If the project was not found to be in substantial compliance or the mitigation measure was found relevant, the City considered whether to use the mitigation measure or an equally effective City mitigation measure (including the mitigation measures developed for the SCEA prepared for the proposed project). The applicable mitigation measures, performance standards, or criteria from the aforementioned documents are included in the SCEA.]

☐ Aesthetics Mitigation Measure: None

☒ Air Quality Mitigation Measure:

AQ-1 Construction Equipment Controls

During construction, all off-road construction equipment greater than 50 horsepower shall minimally meet U.S. EPA Tier 3 emission standards to minimize emissions of atmospheric pollutants associated with diesel construction equipment. Use of construction equipment that meets U.S. EPA Tier 4 emission standards is preferred.

In addition, the RAW includes the following requirements to reduce construction emissions:

Air Monitoring Responsibilities

	<p>Air monitoring will be performed during all site activities in which soil is being disturbed or handled. Air monitoring activities will include:</p> <ul style="list-style-type: none"> • Monitoring dust levels in the exclusion zone and other locations. The work will stop in the event that on-site activities generate dust levels that exceed site or community action levels, or excessive wind speeds. • Assuring that industrial hygiene air sampling equipment and media are properly calibrated and in good working condition. Real-time, data-logging aerosol monitors will be used, when required, to measure dust levels. Real-time information will be posted daily and discussed with site workers. • Monitoring organic vapor concentrations using an organic vapor analyzer to establish upwind, downwind, and worker breathing zone concentrations. • Coordinating general safety activities, including all daily hazard communication, safety practices, and procedure briefings. • Oversight of personal decontamination practices. • General site safety leadership, support and recordkeeping activities. <p>Dust Monitoring Site chemicals of potential concern (COPCs) are a combination of volatile compounds such as TPH, low volatility PAHs or non-volatile metals, but can adhere to soil particles and become airborne contaminants associated with dust generated during soil handling. During periods of active removal, air monitoring for dust and vapor will be performed at the perimeter of the site to ensure that unsafe concentrations of dust are not migrating offsite. Air monitoring will also be conducted within the active work zone to ensure the health and safety of construction workers. An upwind/downwind sampling approach will be used with monitoring positions established based on an ongoing assessment of wind speed and direction.</p> <p>Dust monitoring will be conducted using continuous, real-time particulate dust monitors equipped with data loggers. The dust monitors will be positioned at selected site locations that may vary depending on site work and wind direction. The real-time and time weighted average readings will be checked by on-site personnel approximately every 15 minutes. In addition, a portable hand-held dust monitor may be used to spot-check particulate levels at various site locations if visible dust is observed.</p>
<input type="checkbox"/> Agricultural Resources	Mitigation Measure: None
<input checked="" type="checkbox"/> Biological Resources	<p>Mitigation Measure:</p> <p>BIO-1 Nesting Birds. To avoid disturbance of nesting and special-status birds, including raptorial species protected by the Migratory Bird Treaty Act (MBTA) and California Code, Fish and Game Code (CFGF), activities related to the project, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 30). If construction must begin during the breeding season, then a preconstruction nesting bird survey shall be conducted no more than 3 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird preconstruction survey shall be conducted on foot inside the Project Boundary, including a 300-foot buffer (500-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the</p>

	<p>nesting season. No ground disturbing activities shall occur within this buffer until the avian biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.</p>
<input checked="" type="checkbox"/> Cultural Resources	<p>Mitigation Measure:</p> <p>CR-3 (General Plan Mitigation Measure 4-1) If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South-Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.</p> <p>CR-5 Unanticipated Discovery of Paleontological Resources In the event a fossil is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist in accordance with Society of Vertebrate Paleontology standards. The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant, the paleontologist shall design and carry out a data recovery plan consistent with SVP standards (2010).</p> <p>While not anticipated, the potential for the recovery of human remains during ground-disturbing activities cannot be precluded. Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. In the event that human remains are encountered during project construction activities, the proposed project would be required to comply with these regulations. Compliance would ensure that potential impacts to such resources would be reduced to a less than significant level. In addition, the proposed project would also be required to comply with mitigation measure MM-CUL-4(b) of Southern California Association of Government's (SCAG) 2016 RTP/SCS EIR regarding protection of human remains.</p> <p>SCAG 2016 RTP/SCS EIR Mitigation Measures MM-CUL-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060</p>

	<p>and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: Contact the County Coroner to contact the Native American Heritage Commission (NAHC) to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. • If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: <ul style="list-style-type: none"> • The Native American Heritage Commission is unable to identify a descendent; • The descendant identified fails to make a recommendation; or • The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner
<input type="checkbox"/> Geology / Soils	Mitigation Measure: None
<input type="checkbox"/> Greenhouse Gas Emissions	Mitigation Measure: None
<input checked="" type="checkbox"/> Hazards / Hazardous Materials	<p>Mitigation Measures:</p> <p>HAZ-1: Any surface water remaining onsite in connection with historical research and development of weapons systems, in particular, water located in the anechoic tank within Building 5 and surface water reportedly present in Building 103, shall be properly characterized, i.e., water samples collected and analyzed for COCs by a state-certified laboratory. Analytical results will determine if the waste water will be classified as a non-hazardous or hazardous waste. Handling and transport of waste water shall be conducted in accordance with applicable local, state and federal regulations, including Environmental Protection Agency Resource Conservation and Recovery Act (40 Code of Federal Regulations (CFR) Part 262), Federal and State Occupational Safety and Health Administration, Department of transportation, and DTSC (CCR Title 22).</p> <p>HAZ-2: If, following installation of groundwater monitoring wells and deep soil analytical analysis for perchlorate required by the DTSC, and prior to final installation of landscaping and Low Impact Development measures, DTSC determines perchlorate is present in soil at concentrations that may pose a threat to groundwater, then the applicant shall undertake measures that DTSC may require of the applicant to reduce water migration through the vadose zone resulting from irrigation and surface water infiltration to the satisfaction of DTSC and the City of Pasadena, such as implementing water conservation practices and requiring a review of the design for the stormwater capture and recharge associated with the low impact development measures.</p> <p>HAZ-3 Contaminated soil and water generated during groundwater monitoring well installation and groundwater sampling activities shall be stored in appropriate waste containers, which shall be stored in a secured location such that residents will not come</p>

into contact with contaminated materials. Contaminated soil shall be stored in a roll-off bin or similar container, and water shall be stored in 55-gallon DOT-approved steel drums. Handling and transport of waste shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22).

HAZ-4: Should future sampling events result in the installation of a groundwater remediation system onsite, the system shall be located in a locked compound such that residents will not come into contact with contaminated water or other materials used for remediation. Handling and transport of waste generated during the operation of the remediation system shall be conducted in accordance with applicable local, state and federal regulations, including EPA RCRA (40 CFR Part 262), Federal and State OSHA, Department of Transportation, and DTSC (CCR Title 22).

Permits and Plans

In addition to following the mitigation measures, the required regulatory permits and approvals will be obtained prior to initiation of field activities. The following permits are expected:

- South Coast Air Quality Management District (SCAQMD) Rule 403- Fugitive Dust requires notification to the SCAQMD prior to conducting large construction operations that disturb more than 50 acres or move more than 5,000 cubic yards of soil per day. The proposed soil removal activities do not qualify as a large operation; therefore, SCAQMD notification will not be required. However, dust suppression and air monitoring will be conducted in accordance with applicable elements of Rule 403.
- General conditions of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Excavation of Soil will be followed during the excavation and handling of volatile TPH and VOC impacted soils. The Rule 1166 notification will be made at least 24 hours prior to the start of excavation. A Rule 1166 Various Locations Permit will be in hand prior to commencing excavation activities. Soil excavated during remedial activities will be monitored for the presence of VOCs, using an organic vapor analyzer (OVA). If more than 2,000-cubic yards of VOC contaminated soil (defined as VOC concentrations greater than 50 parts per million [ppm]) as measured from a distance no more than 3 inches from the soil surface) are encountered at any time, then a site-specific VOC Contaminated Soil Mitigation Plan will be prepared and submitted to the SCAQMD for approval. Based on the compendium of soil data from the soil investigations performed at the site, the anticipated quantity of VOC impacted soil to be excavated is substantially less than the 2,000 cubic yard threshold for a site-specific plan; however, in the event that VOC impacted soil excavated quantities begin to approach the threshold quantity, work will be halted pending preparation, submittal, and approval of a site-specific VOC Contaminated Soil Mitigation Plan.
- Soil excavation activities will be conducted in general accordance with the recently adopted SCAQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, which dictates the control of particulate emissions at facilities with elevated levels of arsenic, asbestos, cadmium, hexavalent chromium, lead, mercury, nickel, or polychlorinated biphenyls. At the site, it is known that elevated concentrations of arsenic, lead, and mercury exist. At least 72 hours and no more than 30 days prior to conducting earth-moving activities, SCAQMD will be notified. Permits or plans are not required for Rule 1466.
- An excavation and grading plan will be developed, and a grading permit will be obtained from the city of Pasadena Building & Safety Division.

- A licensed professional geologist (PG) will file a notice of intent with the State Water Resources Control Board to comply with the Construction Activities Storm Water General Permit and obtain a Waste Discharger Identification number prior to beginning removal excavation. Additionally, PG's contractor will use best-management practices in accordance with the site-specific storm water pollution prevention plan (SWPPP).
- Soil removal activities will be conducted in accordance with applicable laws and regulations of the EPA RCRA, Federal and State OSHA, Department of Transportation, and the DTSC (CCR Title 22) regarding the characterization, excavation, and off-site transport/disposal of contaminated soil. A Transportation Plan has been prepared that provides a description of the transportation route to candidate off-site disposal facilities.

Trenching and Excavation

Soils will be excavated to depths exceeding four feet below ground surface in most areas. Excavations deeper than four feet will not be entered by personnel if graded sidewall slopes exceed 1:1, or if shoring is not present. Personnel must obtain approval from the site health and safety officer (SHSO) prior to entering any excavation. On-site personnel will have received Competent Person Training pursuant to Title 8 California Code of Regulations and Subpart P of 29 CFR 1926.650, Trenching and Excavation. Operations involving excavation or trenching will be performed in accordance with 29 CFR 1926.650 and California Regulations for excavations (Title 8, 1539-1547). An excavation is considered to be any man-made cut, cavity, trench, or depression in an earth surface, formed by earth removal. Daily inspections of excavations, the adjacent areas, and protective systems will be made by a competent person to determine if a situation exists that could result in possible cave-ins, failure of protective systems, hazardous atmospheres, or other hazardous conditions.

Stockpile Operation

Excavated suspect contaminated soil will be placed in stockpiles on heavy tarpaulins or plastic sheeting and covered with plastic sheeting (per SCAQMD Rule 1466) or will be placed in covered roll off bins. Per Rule 1466, soil stockpiles shall be no more than 400 cubic yards and shall not be higher than perimeter fencing. Daily inspection of the stockpiles will be performed. Front-end loaders will remove the plastic sheeting and stockpiled material for off-site disposal. During this process, a couple inches of soil from underneath the stockpile will be removed along with the plastic sheeting and stockpiled material to ensure that all potentially contaminated soils are removed. Covered roll-off bins may be used to store accumulated material instead of, or in addition to, soil stockpiles.

Site stockpile management activities will consist of oversight and direction of stockpile segregation into six main categories:

- Construction debris for disposal or recycling;
- Personal protective equipment for disposal at a sanitary landfill;
- Clean overburden soils (where existing) for re-use as backfill
- Non-hazardous waste destined for off-site disposal or recycling;
- Non-RCRA hazardous (California-hazardous) waste destined for off-site disposal or recycling; and
- RCRA hazardous waste destined for off-site disposal or recycling

After soils have been characterized by chemical analysis, stockpiles or roll-off bins will be clearly labeled on site with colored flags designating non-hazardous for disposal, non-RCRA hazardous (CA-HAZ) for disposal, and RCRA hazardous for disposal.

Site Restoration

	Upon completion of soil removal activities and confirmation sampling, the excavations will be graded so that sidewall slopes do not exceed a 1:1 ratio. The redevelopment of the site is a balanced cut and fill project; therefore, excavations will be backfilled with site materials during grading operations. The surface of the site will be graded and prepared to prevent run-off in accordance with a site-specific stormwater pollution prevention plan (SWPPP). The SWPPP will be prepared and notification made by the consultant or contractor prior to the start of field activities.
<input type="checkbox"/> Hydrology / Water Quality	Mitigation Measure: None
<input type="checkbox"/> Land Use / Planning	Mitigation Measure: None
<input type="checkbox"/> Mineral Resources	Mitigation Measure: None
<input checked="" type="checkbox"/> Noise	<p>Mitigation Measure:</p> <p>N-1 Construction Equipment Prior to the issuance of grading permits, the applicant shall submit the construction equipment list to the City's Planning and Community Development Department for approval. The Department shall enforce the following construction requirements:</p> <ul style="list-style-type: none"> Large bulldozers (i.e., those greater than 312 horsepower) shall not be used for any construction activities (e.g., grading, building shell construction, or utility connection activities) within 420 feet of the Kaiser Permanente medical building to the east, 120 feet of the Pasadena City College (PCC) Education Center and commercial uses to the north, and 225 feet of the single-family residences to the north. Instead, small bulldozers (i.e., those not exceeding 104 horsepower) or other similarly sized equipment shall be used, where necessary, within 420 feet of the Kaiser Permanente medical building, 120 feet of the PCC Education Center, and 225 feet of the single-family residences. <p>N-2 Construction Vibration Monitoring Program The applicant shall conduct on-site monitoring to ensure construction operations do not exceed the Caltrans vibration criteria reported in Table 7 of the Transportation and Construction Vibration Guidance Manual (2013). If vibration is found to approach the applicable standards, then additional measures shall be implemented to reduce vibration at impacted sensitive receptors to the maximum extent feasible. Examples of measures that may be implemented during project construction include, but are not limited to:</p> <ul style="list-style-type: none"> Locating haul routes and truck loading operations at an effective distance from nearby sensitive receptors so as to reduce offsite vibration at these offsite buildings; and Phasing construction equipment operations to avoid simultaneous operation of equipment near sensitive receptor locations to reduce vibration levels.
<input type="checkbox"/> Population / Housing	Mitigation Measure: None
<input type="checkbox"/> Public Services	Mitigation Measure: None
<input type="checkbox"/> Recreation	Mitigation Measure: None
<input checked="" type="checkbox"/> Transportation / Traffic	<p>Mitigation Measure: None</p> <p>Although no mitigation measures are required, the following Traffic Control Procedures will be implemented:</p> <p>Truck Staging Area: Haul vehicles shall only be loaded in designated areas. The designated staging area will be identified prior to implementation of RAW activities. Haul trucks may be loaded using a frontend loader, or similar contractor approved equipment, from temporary stockpiles, or direct loaded at the excavation by a backhoe and/or excavator. Whenever possible, haul vehicles shall be loaded in staging areas and avoid</p>

	<p>traveling over exposed contaminated soils to reduce the potential of cross contamination. Haul vehicles shall be loaded in accordance with manufacturer weight limitations. Loads shall be struck level with the waterline of the body of the vehicle to prevent spillage during transport.</p> <p>Site Access Control: A flag person will be positioned at the entrance/exit to assist the truck drivers entering and exiting the site. Waste hauling vehicles will not be allowed to cross soil removal or staging areas.</p> <p>On-Site Traffic Flow: The trucks will be dispatched on a staggered schedule to limit the number of trucks that are staged for loading at any one time. Trucks will be staged out of traffic lanes to the extent possible.</p> <p>Speed Limit: While on site, trucks will be required to maintain slow speeds, less than 5 miles per hour for safety and dust control. While on streets and freeways, transporters will follow the speed limit requirements and defensive driving techniques for traffic safety.</p> <p>Haul Routes: Due to the amount of traffic on East Foothill Boulevard, North Kinneloa Avenue will be used for both ingress and egress of trucks. The contractor may change the entrance and egress patterns or haul trucks entering and leaving the site based on observations of traffic patterns throughout the day. Trucks will enter and exit the site at the North Kinneloa Avenue entrance. Trucks leaving the site will turn right (north) on North Kinneloa Avenue, turn left (west) on East Foothill Boulevard, turn right on Maple Street, and merge onto the 210 Freeway westbound, proceeding to Buttonwillow Landfill, Chiquita Landfill, or Simi Valley Landfill, or turn left (south) on North Kinneloa Avenue with the use of a stationed flag person, turn left (east) on Frontage Road, and merge onto the 210 Freeway eastbound, proceeding to Azusa Landfill, US Ecology Nevada, or South Yuma County Landfill. Estimated round trips are 276 miles and approximately five hours to the Buttonwillow Landfill, 10 miles and approximately one hour to the Azusa Landfill, 43 miles and approximately two hours to the Chiquita Canyon Landfill, 47 miles and approximately 2 hours to the Simi Valley Landfill, 281 miles and approximately five hours to the South Yuma County Landfill, and 290 miles and approximately five hours to US Ecology Nevada. Actual trip times depend on time of day and traffic (further detail provided in the following section). Based on this time estimate, no more than one round trip to the Buttonwillow Landfill, six round trips to the Azusa Landfill, three trips to the Chiquita Landfill, and three trips to the Simi Valley Landfill can be made in one working day. A hazardous materials response company will be available on an on-call basis for response to any accidents involving the trucks utilized to transport site wastes.</p> <p>Local Traffic Control: Transportation of impacted soils or fill materials will be on arterial streets and/or freeways, approved for truck traffic, to minimize any potential impact on the local neighborhood. Moving along the proposed haul route, all street intersections are controlled by traffic lights or stop signs. For those intersections without traffic control signs, a flag person of the Contractor may be located to assist or direct traffic flows during heavy traffic hours. Therefore, the number of daily truckloads during the implementation of the RAW is not expected to disrupt local traffic.</p> <p>Street Maintenance: A "work notice" will be given to the street maintenance authority with a copy of the transportation route map at least three days prior to the implementation of the proposed RAW. Street surfaces along the transportation route will be routinely inspected and, if necessary, maintained or repaired by the contractor, during implementation of the tasks. The Contractor is responsible for cleaning streets from spilled soils and the final cleanup after completion of field activities. The number of daily truckloads during the implementation of the RAW is not expected to cause damage to surface streets.</p>
<input checked="" type="checkbox"/> Tribal Cultural Resources	Mitigation Measure:

	<p>TCR-1 Native American Monitoring</p> <p>During ground-disturbing activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be present. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including site record to the City and the South-Central Coastal Information Center at California State University, Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor.</p>
<input type="checkbox"/> Utilities / Service Systems	

☒ Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

- ☒ Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.
- ☒ Such changes or alterations are within the responsibility and jurisdiction of the Placer County not DTSC.
- ☒ Such changes have been adopted by this public agency or can and should be adopted by this public agency.
- ☐ Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

Based on the above findings, DTSC concludes:

☒ The proposed Project will not result in significant and unavoidable effects to the environment.

☐ The proposed Project will result in significant and unavoidable effects to the following environmental resources.*

- | |
|--|
| <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Agricultural Resources |
| <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Cultural Resources |
| <input type="checkbox"/> Geology/ Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions |
| <input type="checkbox"/> Hazards/Hazardous Materials |
| <input type="checkbox"/> Hydrology/ Water Quality |
| <input type="checkbox"/> Land Use/Planning |

<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise
<input type="checkbox"/> Population/Housing
<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation
<input type="checkbox"/> Transportation/Traffic
<input type="checkbox"/> Utilities/ Service Systems

☒ None of the conditions requiring a subsequent EIR or Negative Declaration pursuant to Cal. Code Regs., tit. 14 Section 15162 exist.

☒ In accordance with Cal. Code of Regs., title 14, section 15093, a Notice of Determination indicating the results of said Findings will be filed with the Governor's Office of Planning and Research / State Clearinghouse.

*Impacts to these resources would remain significant even after applying mitigation measures described in the Lead Agency Final Environmental Document, or there is no feasible mitigation available.

*In accordance with Cal. Code of Regs., title 14, section 15093, a Statement of Overriding Considerations was adopted by the Lead Agency for these resources. DTSC adopts a Statement of Overriding Considerations for these resources having determined that the DTSC Project benefits outweigh the significant environmental effects for the following reasons: The DTSC remedial actions reduce the exposure of contaminated soil, soil gas, and groundwater in order to render it safe for Site occupants. The DTSC remedial project also serves to protect human health and the environment, which are DTSC's responsibilities under the California Health and Safety Code.

D. CERTIFICATION

 Project Manager Signature		 Date
Nick Ta Project Manager Name	Senior Environmental Scientist Project Manager Title	(714) 484-5381 Phone #
 Supervisor Signature		 Date
Patrick Hsieh Supervisor Name	Supervising Sr. Environmental Scientist Supervisor Title	(714) 484-5442 Phone #

